AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY

TITLE V OPERATING PERMIT

Permit No: 87-97-TV | Plant ID: 0741

Effective Date: 6 October 2000 | Expiration Date: 6 October 2005

UTM Northing: 4231.9 | UTM Easting: 602.4

SIC: 5171 | NAICS: 42271 | AFS: 00741

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

Marathon Ashland Petroleum LLC, Algonquin Terminal
1300 Southwestern Parkway
Louisville, KY 40211

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Marathon Ashland Petroleum LLC

Responsible Official: Noel R. Garza

Title of Responsible Official: Manager, Terminal, Transport & Marine

Date Application Received: 7 June 1996

Date Application Administratively Complete: 6 August 1996

Date Public Notice Given: 23 April 2000

Reviewing Engineer (23) | Air Pollution Control Officer

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Abbreviations and Acronyms

AC - Additional Condition
AFS - AIRS Facility Subsystem
AIRS - Aerometric Information Retrieval System
APCD - Air Pollution Control District
ASL - Adjusted Significant Level
atm - Atmosphere
BACT - Best Available Control Technology
Btu - British Thermal Unit
°C - Degrees Centigrade
CEMS - Continuous Emission Monitoring System
CAAA- Clean Air Act Amendments (15 November 1990)
cf - Cubic foot
DOE - District Only Enforceable
°F - Degrees Fahrenheit
gal - Gallon
HAP - Hazardous Air Pollutant
Hg - Mercury
hr - hour
lbs - Pounds
l - Liter
MACT- Maximum Achievable Control Technology
m - Meter
mg - Milligram
mm - Millimeter
MM - Million
MOCS- Management of Change System
NAICS- North American Industry Classification System
NSR - New Source Review
NO_x - Nitrogen oxides
NSPS - New Source Performance Standards
PM - Particulate Matter
PM_{10} - Particulate matter less than 10 microns
ppm - Parts per million
PSD - Prevention of Significant Deterioration
PMP - Preventive Maintenance Plan
psia - Pounds per square inch absolute
RACT - Reasonably Available Control Technology
SIC - Standard Industrial Classification
SIP - State Implementation Plan
SO_2 - Sulfur dioxide
TAL - Threshold Ambient Limit
TAP - Toxic Air Pollutant
tpy - Tons per year
VOC - Volatile Organic Compound

UTM - Universal Transverse Mercator

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance**- The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)

2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

   US EPA - Region IV
   Air Enforcement Branch
   Atlanta Federal Center
   61 Forsyth Street
   Atlanta, GA 30303-8960

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:

   a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.

   b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.

4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

i. An emergency occurred and that the owner or operator can identify the cause of the emergency.

ii. The permitted facility was at the time being properly operated.

iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. (Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)

7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.

8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. (Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

a. Enter the premises to inspect any emissions-related activity or records required in this permit.

b. Have access to and copy records required by this permit.

c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.

d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements. (Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Recordkeeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring,

then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5.

16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.

17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.

18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.

19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.

20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.

21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)

22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.

23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.

24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.

b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.

c. Knowingly making any false statement in any permit application.

d. Noncompliance with Regulation 1.07, section 4.2; or

e. Noncompliance with KRS Chapter 77.

25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.

26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.

27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.

28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.

29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.

30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.

31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.

32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)

33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.

34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745

b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	**Title**
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	**Title**
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for *Existing Affected Facilities*)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for *New Affected Facilities*)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	**Title**
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Programs Fees
8.03	Commuter Vehicle Testing Requirements

Emission Unit U1 Description: Storage Tank with internal floating roof

Applicable Regulations:

Federally Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.43	Daily Emissions Limits	1, 2, 3, 4, & 8
40 CFR Part 60 Subpart A	General Provisions	60.1 through 60.18
40 CFR Part 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	60.110a, 60.111a, 60.112a(a)(2), & 60.115a(a & b)
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.1, 4.1, 4.2, 7, & 8

District Only Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
5.11	Standards of Performance For Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3, & 4
7.02	Federal New Source Performance Standards Incorporated by Reference	1.1, 1.22, 2, 3, 4, & 5

Allowable Emissions:

Pollutants	Standards
VOC	See Additional Condition #1.a.
TAP	See Additional Condition #1.b.

Components:

E1 - Tank # 60 - 40,000 bbl. capacity (1,680,000 gallons), installed 1980

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

a. **VOC** (Regulations 6.43, section 8, and 7.12, section 3.1)

i. The owner or operator shall continue to have floating roofs and meet the seal requirements of 40 CFR Part 60 Subpart Kb on equipment listed in this emission unit. (See comment)

ii. The owner or operator shall comply with the following standards for volatile organic compounds in 40 CFR Part 60 Subpart Kb as required by Regulation 6.43, section 8:

A fixed roof in combination with an internal floating roof meeting the following specifications: 40 CFR 60.112b(a)(1)(i)

1) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

2) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: 40 CFR 60.112b(a)(1)(i)(A)

a) A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. 40 CFR 60.112b(a)(1)(i)(B)

b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. 40 CFR 60.112b(a)(1)(i)(C)

c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the

annular space between the metal sheet and the floating roof. 40 CFR 60.112b(a)(1)(iii)

3) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. 40 CFR 60.112b(a)(1)(iv)

4) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. 40 CFR 60.112b(a)(1)(v)

5) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. 40 CFR 60.112b(a)(1)(vi)

6) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. 40 CFR 60.112b(a)(1)(vii)

7) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. 40 CFR 60.112b(a)(1)(viii)

8) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. 40 CFR 60.112b(a)(1)(ix)

9) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

b. **TAP** (Regulation 5.11, section 1)

The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT analysis has been submitted and approved by the District.

2. **Monitoring** (District Regulation 2.16, section 4.1.9.1.2)

a. **VOC** (Regulation 6.43, section 8)

The owner or operator shall comply with the following monitoring requirements for volatile organic compounds as specified in 40 CFR Part 60 Subpart Kb for this emission unit:

i. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. 40 CFR 60.113b(a)(3)

ii. For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): 40 CFR 60.113b(a)(3)(i)

1) Visually inspect the vessel as specified in paragraph (a)(4) of this section at least every 5 years; or 40 CFR 60.113b(a)(3)(ii)

2) Visually inspect the vessel as specified in paragraph (a)(2) of this section. 40 CFR 60.113b(a)(4)

iii. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2)and (a)(3(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section. 40 CFR 60.113b(a)(5)

iv. Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by

paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.

b. **TAP**

See Addition Condition 3.b.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4.1; 40 CFR Part 60 Subpart Ka)

i. The owner or operator shall keep monthly throughput records to determine the emissions from this emission unit using the AP-42 "Compilation of Air Pollution Emission Factors" document. (Regulation 1.05, section 4.1)

ii. The owner or operator shall comply with the following recordkeeping requirements for volatile organic compounds as required by 40 CFR Part 60 Subpart Ka for this emission unit:

1) Except as provided in paragraph (d) of this section, the owner or operator subject to this subpart shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period. 40 CFR 60.115a(b)

2) Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517, unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). 40 CFR 60.115a(c)

3) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa (2.0 psia) or whose physical properties preclude determination by the recommended method is to be determined from available data and recorded if the estimated true vapor pressure is greater than 6.9 kPa (1.0 psia).

iii. The owner or operator shall keep the following records to demonstrate compliance with the seal requirements in 40 CFR Part 60 Subpart Kb.

1) Emission Unit ID number and Emission point ID number
2) Date of the inspection
3) Name of the inspector
4) Result of the inspection

b. **TAP**

The owner or operator shall evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these record available to the District upon request. If the process change resulted in an increase in emission levels, the owner or operator shall demonstrate that emissions do not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category. The owner or operator shall report semi-annually the following:

a. **VOC**

i. Emission Unit ID number and Emission point ID number
ii. The beginning and ending date of the reporting period
iii. Identification of which seals failed inspection
iv. Description of any corrective action taken for each failure

b. **TAP**

There are no compliance reporting requirements for these pollutants.

Comment

Emission unit U1 has to meet the operational and equipment standards required by Regulation 6.43. This requires meeting the seal requirements of 40 CFR Part 60 Subpart Kb, these being more stringent than the seal requirements of 40 CFR Part 60 Subpart Ka, which is the regulation that applies to U1.

Emission Unit U2 Description: Storage Tanks - internal floating roof

Applicable Regulations:

Federally Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.43	Daily Emissions Limits	1, 2, 3, 4, & 8
40 CFR Part 60 Subpart A	General Provisions	60.1 through 60.18
40 CFR Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	60.110b, 60.111b, 60.112b(a)(1), 60.113b(a), & 60.116b(a, b, c, d, & e)
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3.1, 4.1, 4.2, 7, & 8

District Only Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3, & 4
7.02	Federal New Source Performance Standards Incorporated by Reference	1.1, 1.23, 2, 3, 4, & 5

Allowable Emissions:

Pollutants	Standards
VOC	See Additional Condition #1.a.
TAP	See Additional Condition #1.b.

Components:

E2 - Tank # 61 - 20,000 bbl. capacity (840,000 gallons), installed 1985
E17 - Tank #165 - 67,000 bbl. capacity (2,814,000 gallons), installed 1990

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

   a. **VOC** (Regulations 6.43, section 8, and 7.12, section 3.1; 40 CFR Part 60 Subpart Kb)

      i. The owner or operator shall continue to have floating roofs and meet the seal requirements of 40 CFR Part 60 Subpart Kb on equipment listed in this emission unit. (Regulations 7.12, section 3.1 and 6.43, section 8)

      ii. The owner or operator shall comply with the following standards for volatile organic compounds as required by 40 CFR Part 60 Subpart Kb for this emission unit:

      A fixed roof in combination with an internal floating roof meeting the following specifications: 40 CFR 60.112b(a)(1)(i)

         1) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

         2) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: 40 CFR 60.112b(a)(1)(i)(A)

            a) A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. 40 CFR 60.112b(a)(1)(i)(B)

            b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. 40 CFR 60.112b(a)(1)(i)(C)

c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. 40 CFR 60.112b(a)(1)(iii)

3) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. 40 CFR 60.112b(a)(1)(iv)

4) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. 40 CFR 60.112b(a)(1)(v)

5) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. 40 CFR 60.112b(a)(1)(vi)

6) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. 40 CFR 60.112b(a)(1)(vii)

7) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. 40 CFR 60.112b(a)(1)(viii)

8) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. 40 CFR 60.112b(a)(1)(ix)

9) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

b. **TAP** (Regulations 5.11, section 1 and 5.12, section1)

The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT/BACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC** (Regulation 6.43, section 8; and 40 CFR Part 60 Subpart Kb)

The owner or operator shall comply with the following monitoring requirements for volatile organic compounds as specified in 40 CFR Part 60 Subpart Kb for this emission unit:

i) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. 40 CFR 60.113b(a)(3)

ii) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): 40 CFR 60.113b(a)(3)(i)

1) Visually inspect the vessel as specified in paragraph (a)(4) of this section at least every 5 years; or 40 CFR 60.113b(a)(3)(ii)

2) Visually inspect the vessel as specified in paragraph (a)(2) of this section. 40 CFR 60.113b(a)(4)

iii) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this

paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2)and (a)(3(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section. 40 CFR 60.113b(a)(5)

iv) Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.

b. **TAP**

See Addition Condition 3.b.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4.1 and 40 CFR Part 60 Subpart Kb)

i. The owner or operator shall keep monthly throughput records to determine the emissions from this emission unit using the AP-42 “Compilation of Air Pollution Emission Factors” document. (Regulation 1.05, section 4.1)

ii. The owner or operator shall comply with the following recordkeeping requirements for volatile organic compounds as required by 40 CFR Part 60 Subpart Kb for this emission unit:

1) The owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section will be kept for the life of the source. 40 CFR 60.116b(b) The records must be kept for five years as required by Regulation 2.16, section 4.1.9.2.2.

2) The owner or operator of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the

capacity of the storage vessel. Each storage vessel with a design capacity less than 75 m3 is subject to no provision of this subpart other than those required by this paragraph. 40 CFR 60.116b(c)

3) Except as provided in paragraphs (f) and (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m3 storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m3 but less than 151 m3 storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. 40 CFR 60.116b(d)

4) Except as provided in paragraph (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m3 storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 m3 but less than 151 m3 storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor vapor pressure values for each volume range. 40 CFR 60.116b(e)

5) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. 40 CFR 60.116b(e)(1)

a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. 40 CFR 60.116b(e)(2)

b) For crude oil or refined petroleum products the vapor pressure may be obtained by the following: 40 CFR 60.116b(e)(2)(i)

(i) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to

determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). 40 CFR 60.116b(e)(2)(ii)

(ii) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa. 40 CFR 60.116b(e)(3)

c) For other liquids, the vapor pressure: 40 CFR 60.116b(e)(3)(i)

(i) May be obtained from standard reference texts, or 40 CFR 60.116b(e)(3)(ii)

(ii) Determined by ASTM Method D2879-83 (incorporated by reference—see §60.17); or 40 CFR 60.116b(e)(3)(iii)

(iii) Measured by an appropriate method approved by the Administrator; or 40 CFR 60.116b(e)(3)(iv)

(iv) Calculated by an appropriate method approved by the Administrator.

b. **TAP**

The owner or operator shall evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these record available to the District upon request. If there is an increase in emission levels, the owner or operator shall demonstrate that emissions do not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the

owner or operator shall report a negative declaration for the following category. The owner or operator shall report semi-annually the following:

a. **VOC**

i. Emission Unit ID number and Emission point ID number
ii. The beginning and ending date of the reporting period
iii. Identification of which seals failed inspection
iv. Description of any corrective action taken for each failure

b. **TAP**

There are no compliance reporting requirements for these pollutants.

Emission Unit U3 Description: Storage Tanks - cone roof

Applicable Regulations:

Federally Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
40 CFR Part 60 Subpart A	General Provisions	60.1 through 60.18
40 CFR Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	60.110b(a & c), 60.116b(a & b)

District Only Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
7.02	Federal New Source Performance Standards Incorporated by Reference	1.1, 1.23, 2, 3, 4, & 5

Allowable Emissions:

Pollutants	Standards
VOC	See Additional Condition #1

Components:

E16 - Tank # 164 - 80,000 bbl. capacity (3,360,000 gallons), installed 1990
E18 - Tank # 166 - 96,000 bbl. capacity (4,032,000 gallons), installed 1991
E19 - Tank # 167 - 67,000 bbl. capacity (2,814,000 gallons), installed 1991
E20 - Tank # 169 - 78,000 bbl. capacity (3,276,000 gallons), installed 1992
E21 - Tank # 170 - 350 bbl. capacity (14,700 gallons), installed 1991
E22 - Tank # 171 - 350 bbl. capacity (14,700 gallons), installed 1991
E23 - Tank # 172 - 350 bbl. capacity (14,700 gallons), installed 1991

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

   VOC (Regulation 2.02, section 2.3.9.2)

   The owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 0.5 psia in storage vessels listed in this emission unit. (See comment)

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

   VOC

   See Addition Condition 3.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

   VOC (Regulation 2.16, section 4.1.9.2 and 40 CFR Part 60 Subpart Kb)

   a. The owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section will be kept for the life of the source. (40 CFR 60.116b(b)) The records must be kept for five years as required by Regulation 2.16, section 4.1.9.2.2.

   b. The owner or operator of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Each storage vessel with a design capacity less than 75 m^3 is subject to no provision of this subpart other than those required by this paragraph. 40 CFR 60.116b(c)

   c. The owner or operator shall keep monthly throughput records to determine the emissions from this emission unit, using the AP-42 “Compilation of Air Pollution Emission Factors” document.

   d. The owner or operator shall maintain daily records of the material stored in these tanks to demonstrate compliance with additional condition 1.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

   The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category. The owner or operator shall report semi-annually the following:

   VOC

a. Emission Unit ID number and Emission point ID number
b. The beginning and ending date of the reporting period
c. Identification of all periods of non-compliant material being stored

Comment

For emission unit U3 the only regulation that applies is the Federal regulation 40 CFR Part 60 Subpart Kb due to the size of the tanks. District regulations do not apply because these tanks store fuel oils with a vapor pressure less than 10 mm Hg at conditions of 20^{o} C and 760 mm of Hg. (Regulation 2.02 section 2.3.9.2)

Emission Unit U4 Description: Storage Tanks - cone roof

Applicable Regulations:

Federally Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1 & 2

District Only Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, & 5
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3, & 4

Allowable Emissions:

Pollutants	Standards
VOC	See Additional Condition #1.a.
TAP	See Additional Condition #1.b.

Components:

E24 - Tank # 173 - 47 bbl. capacity (1,974 gallons), installed 1992
E25 - Tank # 174 - 238 bbl. capacity (horizontal) (9,996 gallons), installed 1993

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

   a. **VOC** (Regulation 7.12, section 3.1)

      The owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia in storage vessels listed in this emission unit. (See comment)

   b. **TAP** (Regulation 5.12, section 1)

      The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a BACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

   a. **VOC**

      See Additional Condition 3.a.

   b. **TAP**

      See Additional Condition 3.b.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

   a. **VOC** (Regulation 1.05, section 4.1)

      i. The owner or operator shall keep monthly throughput records to determine the emissions from this emission unit using the AP-42 “Compilation of Air Pollution Emission Factors” document.

      ii. The owner or operator shall maintain daily records of the material stored in these tanks to demonstrate compliance with additional condition 1.a.

   b. **TAP**

      The owner or operator shall evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these record available to the District upon request. If there is an increase in emission levels, the owner or operator shall demonstrate that emissions do not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category. The owner or operator shall report semi-annually the following:

a. **VOC**

i. Emission Unit ID number and Emission point ID number
ii. The beginning and ending date of the reporting period
iii. Identification of all periods of non-compliant material being stored

b. **TAP**

There are no compliance reporting requirements for these pollutants.

Comment

For emission unit U4 there are no standards in Regulation 7.12 that apply due to the vapor pressure of the material stored.

Emission Unit U5 Description: Storage Tanks - internal floating roof

Applicable Regulations:

Federally Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.13	Standards of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 2, 3.1, 4.1, & 4.2
6.43	Daily Emission Limits	1, 2, 3, 4, & 8

District Only Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3, & 4

Allowable Emissions:

Pollutants	Standards
VOC	See Additional Condition #1.a.
TAP	See Additional Condition #1.b.

Components:

E6 - Tank # 107 - 2,300 bbl. capacity (96,699 gallons), installed 1959
E7 - Tank # 113 - 55,950 bbl. capacity (2,349,900 gallons), installed 1947
E9 - Tank # 130 - 51,000 bbl. capacity (2,142,000 gallons), installed before 1973
E11 - Tank # 133 - 54,000 bbl. capacity (2,268,000 gallons), installed 1964
E15 - Tank #162 - 96,000 bbl. capacity (4,032,000 gallons), installed 1967

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

   a. **VOC** (Regulations 6.13, section 3.1 and 6.43, section 8)

      i. The owner or operator shall continue to have floating roofs and meet the seal requirements of 40 CFR Part 60 Subpart Kb on equipment listed in this emission unit. (Regulations 6.13, section 3.1 and 6.43, section 8)

      ii. The owner or operator shall comply with the following standards for volatile organic compounds as specified in 40 CFR Part 60 Subpart Kb: (Regulation 6.43, section 8)

      A fixed roof in combination with an internal floating roof meeting the following specifications: 40 CFR 60.112b(a)(1)(i)

         1) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

         2) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: 40 CFR 60.112b(a)(1)(i)(A)

            a) A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. 40 CFR 60.112b(a)(1)(i)(B)

            b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. 40 CFR 60.112b(a)(1)(i)(C)

c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. 40 CFR 60.112b(a)(1)(iii)

3) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. 40 CFR 60.112b(a)(1)(iv)

4) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. 40 CFR 60.112b(a)(1)(v)

5) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. 40 CFR 60.112b(a)(1)(vi)

6) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. 40 CFR 60.112b(a)(1)(vii)

7) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. 40 CFR 60.112b(a)(1)(viii)

8) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. 40 CFR 60.112b(a)(1)(ix)

9) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

b. **TAP** (Regulation 5.11, section 1)

The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC** (Regulation 6.43, section 8)

The owner or operator shall comply with the following monitoring requirements for volatile organic compounds as specified in 40 CFR Part 60 Subpart Kb:

i. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. 40 CFR 60.113b(a)(3)

ii. For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): 40 CFR 60.113b(a)(3)(i)

1) Visually inspect the vessel as specified in paragraph (a)(4) of this section at least every 5 years; or 40 CFR 60.113b(a)(3)(ii)

2) Visually inspect the vessel as specified in paragraph (a)(2) of this section. 40 CFR 60.113b(a)(4)

iii. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event

shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2)and (a)(3(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section. 40 CFR 60.113b(a)(5)

iv. Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.

b. **TAP**

See Addition Condition 3.b.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4.1)

The owner or operator shall keep monthly throughput records to determine the emissions from this emission unit using the AP-42 “Compilation of Air Pollution Emission Factors” document.

b. **TAP**

The owner or operator shall evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these record available to the District upon request. If there is an increase in emission levels, the owner or operator shall demonstrate that emissions do not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the

owner or operator shall report a negative declaration for the following category. The owner or operator shall report semi-annually the following:

a. **VOC**
   i. Emission Unit ID number and Emission point ID number
   ii. The beginning and ending date of the reporting period
   iii. Identification of which seals failed inspection
   iv. Description of any corrective action taken for each failure

b. **TAP**

There are no compliance reporting requirements for these pollutants.

Emission Unit U6 Description: Storage Tanks - cone roof

Applicable Regulations:

Federally Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.13	Standards of Performance for Existing Storage Vessels for Volatile Organic Compounds	1, 2

District Only Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3, & 4

Allowable Emissions:

Pollutants	Standards
VOC	See Additional Condition #1.a.
TAP	See Additional Condition #1.b.

Components:

E3 - Tank # 96 - 34,900 bbl. capacity (1,465,800 gallons), installed before 1973
E8 - Tank # 119 - 54,000 bbl. capacity (2,268,000 gallons), installed 1972
E10 - Tank # 132 - 12,890 bbl. capacity (541,380 gallons), installed 1961
E12 - Tank # 137 - 6,060 bbl. capacity (254,520 gallons), installed 1964
E13 - Tank # 156 - 54,560 bbl. capacity (2,291,520 gallons), installed 1965
E14 - Tank # 157 - 54,560 bbl. capacity (2,291,520 gallons), installed 1965

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

   a. **VOC** (Regulation 6.13, section 3.1)

      The owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia in storage vessels listed in this emission unit. (See comment)

   b. **TAP** (Regulation 5.11, section 1)

      The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

   a. **VOC**

      See Additional Condition 3.a.

   b. **TAP**

      See Additional Condition 3.b.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

   a. **VOC** (Regulation 1.05, section 4.1)

      i. The owner or operator shall keep monthly throughput records to determine the emissions from this emission unit using the AP-42 “Compilation of Air Pollution Emission Factors” document.

      ii. The owner or operator shall maintain daily records of the material stored in these tanks to demonstrate compliance with additional condition 1.a.

   b. **TAP**

      The owner or operator shall evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these record available to the District upon request. If there is an increase in emission levels, the owner or operator shall demonstrate that emissions do not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for the following category. The owner or operator shall report semi-annually the following:

a. **VOC**

i. Emission Unit ID number and Emission point ID number
ii. The beginning and ending date of the reporting period
iii. Identification of all periods of non-compliant material being stored

b. **TAP**

There are no compliance reporting requirements for these pollutants.

Comment

For emission unit U6 there are no standards in Regulation 6.13 that apply due to the vapor pressure of the materal stored. Federal regulation 40 CFR Part 60 Subpart K does not apply due to the date of equipment installation.

Emission Unit U7 Description: Terminal loading rack with carbon adsorption vapor recovery system

Applicable Regulations:

Federally Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
6.21	Standards of Performance for Existing Gasoline Loading Facilities at Bulk Terminals	1, 2, 3, 4, & 5
6.22	Standards of Performance for Existing Volatile Organic Materials Loading Facilities	1, 2, 3.2, 4, & 5
40 CFR Part 60 Subpart A	General Provisions	60.1 through 60.18
40 CFR Part 60 Subpart XX	Standards of Performance for Bulk Gasoline Terminals	60.500, 60.501, 60.502 (a, b, d, e, f, g, h, i, & j), 60.503 & 60.505

District Only Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
5.11	Standards of Performance For Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3, & 4
7.02	Federal New Source Performance Standards Incorporated by Reference	1.1, 1.60, 2, 3, 4, & 5

Allowable Emissions:

Pollutants	Standards
VOC	See Additional Condition #1.a.
TAP	See Additional Condition #1.b.

Components:

E26 - Bay #1 - gasoline loading
E27 - Bay #2 - gasoline loading
E28 - Bay #3 - other VOC material loading
E29 - Bay #4 - other VOC material loading
E30 - Bay #5 - other VOC material loading
E31 - Bay #6 - other VOC material loading

Control Device:

C1/C2 - Carbon Ad/Absorption Vapor Recovery Unit consisting of two packed carbon adsorption towers, Stack S1/S2

Additional Conditions

1. **Emission Standards** (Regulation 2.16, section 4.1.1)

   a. **VOC** (Regulations 6.21, section 3; 6.22, section 3; and 40 CFR Part 60 Subpart XX)

      i. The owner or operator shall comply with the following standards for volatile organic compounds as required by Regulation 6.21 section 3:

         1) No owner or operator of any loading facility shall load gasoline unless such facility is equipped with a vapor control system which is in good working order and in operation.

         2) Loading shall be accomplished in such a manner that all displaced vapor and air will be vented only to the vapor collection system. Measures shall be taken to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

         3) No owner or operator shall permit the volatile organic compound emissions from the vapor control device to exceed 80 milligrams per liter of gasoline loaded.

         4) No owner or operator shall open tank hatches or allow hatches to be opened at any time during loading operations if bottom-fill is practiced. If top-submerged fill is practiced, the hatch is to be opened the minimum time necessary to install and remove the submerged fill pipe and associated vapor collection equipment.

         5) No owner or operator shall permit gasoline to be spilled, discarded in sewers, stored in open containers, or handled in any other manner that would result in evaporation.

         6) No owner or operator of a bulk gasoline terminal subject to this regulation shall allow loading on or after April 1, 1983 unless the following provisions are met:

            a) The vapor control system and associated equipment are designed and operated to prevent gauge pressure in the tank truck or trailer from exceeding 450 mm water (18 inches water) and prevent vacuum from exceeding 150 mm water (six inches water);

            b) A pressure tap or any equivalent system as approved by the District is installed on the vapor collection system so that a magnehelic gauge, supplied by the owner or operator, can

be connected to the tap in order to determine compliance with section 3.6.1. The pressure tap shall be installed by the owner or operator as close as possible to the connection with the tank truck or trailer, and shall consist of a 1/4 inch tubing connector which is compatible with the use of 3/16 inch inside diameter plastic tubing;

c) During loading operations there is no reading greater than or equal to 100% of the lower explosive limit (LEL, measured as propane) at a distance of 2.5 centimeters (one inch) from the potential leak source associated with the vapor collection system of a bulk gasoline terminal as detected by a combustible gas detector using the test procedure in section 5.4; and

d) The tank truck or trailer has a valid Kentucky pressure-vacuum test sticker as required by Regulation 6.37 attached and visibly displayed.

ii. The owner or operator shall comply with the following standards for volatile organic compounds as required by Regulation 6.22 section 3:

No owner or operator of any loading facility from which 20,000 gallons or more of volatile organic materials are loaded in any one day shall load such materials unless such facility is equipped with a device which reduces the emissions of all hydrocarbon vapors and gases by at least 90% by weight, and which is properly installed, in good working order, and in operation. Loading shall be accomplished in such a manner that all displaced vapor and air will be vented only to the vapor recovery system. Measures shall be taken to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

iii. The owner or operator shall comply with the following standards for volatile organic compounds as required by 40 CFR Part 60 Subpart XX:

1) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading. 40 CFR 60.502(b)

2) For each affected facility equipped with an existing vapor processing system, the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 80 milligrams of total organic compounds per liter of gasoline loaded. 40 CFR 60.502(d)

3) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. 40 CFR 60.502(e)

4) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: 40 CFR 60.502(e)(1)

a) The owner or operator shall obtain the vapor tightness documentation described in §60.505(b) for each gasoline tank truck which is to be loaded at the affected facility. 40 CFR 60.502(e)(2)

b) The owner or operator shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility. 40 CFR 60.502(e)(3)

c) (i) The owner or operator shall cross-check each tank identification number obtained in paragraph (e)(2) of this section with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained: 40 CFR 60.502(e)(3)(i)(A)

(A) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or 40 CFR 60.502(e)(3)(i)(B)

(B) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually. 40 CFR 60.502(e)(3)(ii)

(ii) If either the quarterly or semiannual cross-check provided in paragraphs (e)(3)(i) (A) through (B) of this section reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met. [§60.502(e)(3) amended at 64 FR 7466, Feb. 12, 1999, effective April 13, 1999] 40 CFR 60.502(e)(4)

d) The terminal owner or operator shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in paragraph (e)(3) of this section. [§60.502(e)(4) amended at 64 FR 7466, Feb. 12 , 1999, effective April 13, 1999] 40 CFR 60.502(e)(5)

e) The terminal owner or operator shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained. 40 CFR 60.502(e)(6)

f) Alternate procedures to those described in paragraphs (e)(1) through (5) of this section for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator. 40 CFR 60.502(f)

5) The owner or operator shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. 40 CFR 60.502(g)

6) The owner or operator shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. 40 CFR 60.502(h)

7) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in §60.503(d). 40 CFR 60.502(i)

8) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). 40 CFR 60.502(j)

9) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the

source of the leak repaired within 15 calendar days after it is detected.

b. **TAP** (Regulation 5.11, section 1)

The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC** (Regulation 1.05, section 4.1)

i. The owner or operator shall perform semi-annual and annual maintenance checks on the vapor recovery unit. These checks include, but are not limited to, a thorough check of the unit's valves, flanges, pumps, seals, gauges, fluid levels, piping and associated loading rack components.

ii. The owner or operator shall maintain a daily and weekly checklist as submitted in their 1.05 Compliance Plan dated April 2000. (see Attachment 1) The checklist includes, but is not limited to, maximum vacuum pulled during the regeneration cycle, and gasoline supply temperature. (Regulation 1.05, section 4.1)

b. **TAP**

See Additional Condition 3.b.

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4.1 and 40 CFR Part 60 Subpart XX)

i. The owner or operator shall keep the following records in accordance with 40 CFR Part 60 Subpart XX. The records must be kept for five years as required by Regulation 2.16, section 4.1.9.2.2.

1) The tank truck vapor tightness documentation required under §60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection. 40 CFR 60.505(b)

2) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:

a) Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.

b) Tank owner and address.
c) Tank identification number.
d) Testing location.
e) Date of test.
f) Tester name and signature.
g) Witnessing inspector, if any: Name, signature, and affiliation.
h) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs). 40 CFR 60.505(c)

3) A record of each monthly leak inspection required under §60.502(j) shall be kept on file at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following information:

a) Date of inspection.
b) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
c) Leak determination method.
d) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
e) Inspector name and signature. 40 CFR 60.505(d)

4) The terminal owner or operator shall keep documentation of all notifications required under §60.502(e)(4) on file at the terminal for at least 5 years. 40 CFR 60.505(e); 40 CFR 60.505(f)

5) The owner or operator of an affected facility shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 5 years.

ii. The owner or operator shall keep records, on a daily basis, of throughput for the loading rack. The owner or operator shall maintain a daily and weekly checklist as submitted in their 1.05 Compliance Plan dated April 2000. (see Attachment 1) The checklist includes, but is not limited to, maximum vacuum pulled during the regeneration cycle, and gasoline supply temperature. (Regulation 1.05, section 4.1)

b. **TAP**

The owner or operator shall evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these record available to the District upon request. If there is an increase in emission levels, the owner or operator shall demonstrate that emissions do not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report semi-annually the following:

a. **VOC**

i. For emission points subject to 40 CFR Part 60 Subpart XX:

1) Emission unit ID number and emission point ID number
2) The beginning and ending date of the reporting period
3) Identification of all deviations from the pressure limitations
4) Identify the number of trucks that fail the vapor tightness requirements

ii. For emission points subject to Regulation 6.21:

1) Emission unit ID number and emission point ID number
2) The beginning and ending date of the reporting period
3) Identification of all deviations from the pressure limitations
4) Identification of all periods of exceedances of the LEL

b. **TAP**

There are no compliance reporting requirements for these pollutants.

Emission Unit U8 Description: Barge loading operation for gasoline and other volatile organic liquids with a marine vapor combustion system

Applicable Regulations:

Federally Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 3, 4, & 5
2.04	Construction or Modificaiton of Major Source In or Impacting Upon Non-Attainment Areas (Emission Offset Requirements)	1, 2, 3, 4, 5, 6, 7, 8, 9, & 10
40 CFR Part 63 Subpart A	General Provisions	63.1 through 63.15
40 CFR Part 63 Subpart Y	National Emission Standards for Marine Vessel Tank Loading Operations	63.560, 63.561, 63.562(a, b, & e), 63.563(a, b, & c), 63.564(a, b, c, d, & e), 63.565(a, b, c, d, f, & g), 63.567(a, b, d, e, f, g, h, i, j, & k)

District Only Enforceable Regulations		
Regulation	**Title**	**Applicable Sections**
5.11	Standards of Performance For Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6
5.14	Hazardous Air Pollutants and Source Categories	1, 2, 3, & 4
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated by Reference	2.1, 2.21, 3, 4, & 5

Allowable Emissions:

Pollutants	Standards
VOC	See Additional Condition #1.a.
TAP	See Additional Condition #1.b.

Components:
E40 - Barge Loading Operation

Control Device:
C3 - Vapor Combustion System, stack S3

Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

a. **VOC** (Regulation 2.04 and 40 CFR Part 63 Subpart Y)

i. The owner or operator shall not barge load more than 504-million-gallons of gasoline during any consecutive twelve month period, and shall not exceed 18 milligrams of total organic compound per liter of gasoline loaded on the marine vapor combustion sytem, to avoid PSD requirements.

ii. The owner or operator shall comply with the following standards for volatile organic compounds as required by 40 CFR Part 63 Subpart Y:

1) The emissions limitations in paragraphs (b), (c), and (d) of this section apply during marine tank vessel loading operations. 40 CFR 63.562(b)

2) MACT standards. 40 CFR 63.562(b)(1)

a) (i) Vapor collection system of the terminal. The owner or operator of a new source with emissions less than 10 and 25 tons and an existing or new source with emissions of 10 or 25 tons shall equip each terminal with a vapor collection system that is designed to collect HAP vapors displaced from marine tank vessels during marine tank vessel loading operations and to prevent HAP vapors collected at one loading berth from passing through another loading berth to the atmosphere, except for those commodities exempted under §63.560(d). 40 CFR 63.562(b)(1)(ii)

(ii) Ship-to-shore compatibility. The owner or operator of a new source with emissions less than 10 and 25 tons and an existing or new source with emissions of 10 or 25 tons shall limit marine tank vessel loading operations to those vessels that are equipped with vapor collection equipment that is compatible with the terminal's vapor collection system, except for those commodities exempted under §63.560(d). 40 CFR 63.562(b)(1)(iii)

(iii) Vapor tightness of marine vessels. The owner or operator of a new source with emissions less than 10 and 25 tons and an existing or new source with emissions of 10 or 25 tons shall limit marine tank vessel loading operations to those vessels that are

vapor tight and to those vessels that are connected to the vapor collection system, except for those commodities exempted under §63.560(d). 40 CFR 63.562(b)(2)

b) MACT standards for new sources. The owner or operator of a new source with emissions less than 10 and 25 tons or a new source with emissions of 10 or 25 tons, except offshore loading terminals and the VMT source, shall reduce HAP emissions from marine tank vessel loading operations by 98 weight-percent, as determined using methods in §63.565(d) and (l). 40 CFR 63.562(b)(4)

c) Maintenance allowance for loading berths. The owner or operator of a source subject to paragraph (b)(2), (3) or (4), may apply for approval to the Administrator for a maintenance allowance for loading berths based on a percent of annual throughput or annual marine tank vessel loading operation time for commodities not exempted in §63.560(d). The owner or operator shall maintain records for all maintenance performed on the air pollution control equipment. The Administrator will consider the following in approving the maintenance allowance: 40 CFR 63.562(b)(6)(i)

(i) The owner or operator expects to be in violation of the emissions standards due to maintenance; 40 CFR 63.562(b)(6)(ii)

(ii) Due to conditions beyond the reasonable control of the owner or operator, compliance with the emissions standards during maintenance would result in unreasonable economic hardship; 40 CFR 63.562(b)(6)(iii)

(iii) The economic hardship cannot be justified by the resulting air quality benefit; 40 CFR 63.562(b)(6)(iv)

(iv) The owner or operator has given due consideration to curtailing marine vessel loading operations during maintenance; 40 CFR 63.562(b)(6)(v)

(v) During the maintenance allowance, the owner or operator will endeavor to reduce emissions from other loading berths that are controlled as well as from the loading berth the owner or operator is

seeking the maintenance allowance; and 40 CFR 63.562(b)(6)(vi)

(vi) During the maintenance allowance, the owner or operator will monitor and report emissions from the loading berth to which the maintenance allowance applies. 40 CFR 63.562(c)

d) Operation and maintenance requirements for air pollution control equipment and monitoring equipment for affected sources. At all times, including periods of startup, shutdown, and malfunction, owners or operators of affected sources shall operate and maintain a source, including associated air pollution control equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. 40 CFR 63.562(e)(1)

(i) The Administrator will determine compliance with design, equipment, work practice, or operational emission standards by evaluating an owner or operator's conformance with operation and maintenance requirements. 40 CFR 63.562(e)(2)

(ii) The owner or operator of an affected source shall develop and implement a written operation and maintenance plan that describes in detail a program of corrective action for varying (i.e., exceeding baseline parameters) air pollution control equipment and monitoring equipment, based on monitoring requirements in §63.564, used to comply with these emissions standards. The plan shall also identify all routine or otherwise predictable continuous monitoring system (thermocouples, pressure transducers, continuous emissions monitors (CEMS), etc.) variances. 40 CFR 63.562(e)(2)(i)

(A) The plan shall specify procedures (preventive maintenance) to be followed to ensure that pollution control equipment and monitoring equipment functions properly and variances of the control equipment and monitoring

equipment are minimal. 40 CFR 63.562(e)(2)(ii)

(B) The plan shall identify all operating parameters to be monitored and recorded for the air pollution control device as indicators of proper operation and shall establish the frequency at which the parameters will be monitored (see §63.564). 40 CFR 63.562(e)(2)(iii)

(C) Owners or operators of affected sources shall incorporate a standardized inspection schedule for each component of the control device used to comply with the emissions standards in §63.562(b), (c), and (d). To satisfy the requirements of this paragraph, the owner or operator may use the inspection schedule recommended by the vendor of the control system or any other technical publication regarding the operation of the control system. 40 CFR 63.562(e)(2)(iv)

(D) Owners or operators shall develop and implement a continuous monitoring system (CMS) quality control program. The owner or operator shall develop and submit to the Administrator for approval upon request a site-specific performance evaluation test plan for the CMS performance evaluation required in §63.8(e) of subpart A of this part. Each quality control program shall include, at a minimum, a written protocol that describes procedures for initial and any subsequent calibration of the CMS; determination and adjustment of the calibration drift of the CMS; preventive maintenance of the CMS, including spare parts inventory; data recording, calculations, and reporting; and accuracy audit procedures, including sampling and analysis methods. The owner or operation shall maintain records of the procedures that are part of the quality control program developed and implemented for CMS. 40 CFR 63.562(e)(3)

(iii) Based on the results of the determination made under paragraph (e)(2), the Administrator may require that an owner or operator of an affected source make changes to the operation and maintenance plan for that source. Revisions may be required if the plan: 40 CFR 63.562(e)(3)(i)

(A) Does not address a variance of the air pollution control equipment or monitoring equipment that has occurred that increases emissions; 40 CFR 63.562(e)(3)(ii)

(B) Fails to provide for operation during a variance of the air pollution control equipment or the monitoring equipment in a manner consistent with safety and good air pollution control practices; or 40 CFR 63.562(e)(3)(iii)

(C) Does not provide adequate procedures for correcting a variance of the air pollution control equipment or monitoring equipment as soon as reasonable. 40 CFR 63.562(e)(4)

(iv) If the operation and maintenance plan fails to address or inadequately addresses a variance event at the time the plan was initially developed, the owner or operator shall revise the operation and maintenance plan within 45 working days after such an event occurs. The revised plan shall include procedures for operating and maintaining the air pollution control equipment or monitoring equipment during similar variance events and a program for corrective action for such events. 40 CFR 63.562(e)(5)

(v) The operation and maintenance plan shall be developed by the source's compliance date. The owner or operator shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Administrator for the life of the source. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection upon request by the Administrator for

a period of 5 years after each revision to the plan. 40 CFR 63.562(e)(6)

(vi) To satisfy the requirements of the operation and maintenance plan, the owner or operator may use the source's standard operating procedures (SOP) manual, an Occupational Safety and Health Administration (OSHA) plan, or other existing plans provided the alternative plans meet the requirements of this section and are made available for inspection when requested by the Administrator.

b. **TAP** (Regulation 5.11, section 1)

The owner or operator shall not allow or cause the TAP emissions to exceed the adjusted significant level (ASL) value, unless modeling or a RACT analysis has been submitted and approved by the District.

2. **Compliance** (Regulation 2.16, section 4.1.1)

VOC (40 CFR Part 63 Subpart Y)

The owner or operator shall perform the following requirements to demonstrate compliance with 40 CFR Part 63 Subpart Y:

a. The following procedures shall be used to determine compliance with the emissions limits under §63.562(b)(1), (c)(2), and (d)(1): 40 CFR 63.563(a)(1)

i. Vent stream by-pass requirements for the terminal's vapor collection system. 40 CFR 63.563(a)(1)(i)

1) In accordance with §63.562(b)(1)(i), (c)(2)(i), and (d)(1)(i), each valve in the terminal's vapor collection system that would route displaced vapors to the atmosphere, either directly or indirectly, shall be secured closed during marine tank vessel loading operations either by using a car-seal or a lock-and-key type configuration, or the by-pass line from the valve shall be equipped with a flow indicator, except for those valves used for pressure/vacuum relief, analyzers, instrumentation devices, sampling, and venting for maintenance. Marine tank vessel loading operations shall not be performed with open by-pass lines. 40 CFR 63.563(a)(1)(ii)

2) Repairs shall be made to valves, car-seals, or closure mechanisms no later than 15 days after a change in the position of the valve or a break in the car-seal or closure mechanism is detected or no later than prior to the next marine tank vessel loading operation, whichever is later. 40 CFR 63.563(a)(2)

ii. Ship-to-shore compatibility of vapor collection systems. Following the date on which the initial performance test is completed, marine tank vessel loading operations must be performed only if the marine tank vessel's vapor collection equipment is compatible to the terminal's vapor collection system; marine tank vessel loading operations must be performed only when the marine tank vessel's vapor collection equipment is connected to the terminal's vapor collection system, as required in §63.562(b)(1)(ii), (c)(2)(ii), and (d)(1)(ii). 40 CFR 63.563(a)(3)

iii. Pressure/vacuum settings for the marine tank vessel's vapor collection equipment. During the initial performance test required in paragraph (b)(1) of this section, the owner or operator of an affected source shall demonstrate compliance with operating pressure requirements of 33 CFR 154.814 using the procedures in §63.565(b). 40 CFR 63.563(a)(4)

iv. Vapor-tightness requirements of the marine vessel. The owner or operator of an affected source shall use the procedures in paragraph (a)(4)(i), (ii), (iii), or (iv) of this section to ensure that marine tank vessels are vapor tight, as required in §63.562(b)(1)(iii), (c)(2)(iii), and (d)(1)(iii). 40 CFR 63.563(a)(4)(i)

1) Pressure test documentation for determining vapor tightness of the marine vessel. The owner or operator of a marine tank vessel, who loads commodities containing HAP not determined to be exempt under §63.560(d) at an affected source, shall provide a copy of the vapor-tightness pressure test documentation described in §63.567(i) for each marine tank vessel prior to loading. The date of the test listed in the documentation must be within the preceding 12 months, and the test must be conducted in accordance with the procedures in §63.565(c)(1). Following the date on which the initial performance test is completed, the affected source must check vapor-tightness pressure test documentation for marine tank vessels loaded at positive pressure. 40 CFR 63.563(a)(4)(ii)

2) Leak test documentation for determining vapor tightness of the marine vessel. If no documentation of the vapor tightness pressure test as described in paragraph (a)(4)(i) of this section is available, the owner or operator of a marine tank vessel, who loads commodities containing HAP not determined to be exempt under §63.560(d) at an affected source, shall provide the leak test documentation described in §63.567(i) for each marine tank vessel prior to loading. The date of the test listed in the documentation must be within the preceding 12 months, and the test must be conducted in accordance with the procedures in §63.565(c)(2). If the marine tank vessel has failed its most recent vapor-tightness leak test at that terminal, the owner or operator of the non-vapor-tight marine tank vessel shall provide documentation

that the leaks detected during the previous vapor-tightness test have been repaired and documented with a successful vapor-tightness leak test described in §63.565(c)(2) conducted during loading. If the owner or operator of the marine tank vessel can document that repair is technically infeasible without cleaning and gas freeing or dry-docking the vessel, the owner or operator of the affected source may load the marine tank vessel. Following the date on which the initial performance test is completed, an affected source must check the vapor-tightness leak test documentation for marine tank vessels loaded at positive pressure. 40 CFR 63.563(a)(4)(iii)

3) Leak test performed during loading using Method 21 for determining vapor tightness of the marine vessel. If no documentation of vapor tightness as described in paragraphs (a)(4)(i) or (ii) of this section is available, the owner or operator of a marine tank vessel, who loads commodities containing HAP not determined to be exempt under §63.560(d) at an affected source, shall perform a leak test of the marine tank vessel during marine tank vessel loading operation using the procedures described in §63.565(c)(2). 40 CFR 63.563(a)(4)(iii)(A)

a) If no leak is detected, the owner or operator of a marine tank vessel shall complete the documentation described in §63.567(i) prior to departure of the vessel. 40 CFR 63.563(a)(4)(iii)(B)

b) If a leak is detected, the owner or operator of the marine tank vessel shall document the vapor-tightness failure for the marine tank vessel prior to departure of the vessel. The leaking component shall be repaired prior to the next marine tank vessel loading operation at a controlled terminal unless the repair is technically infeasible without cleaning and gas freeing or dry-docking the vessel. If the owner or operator of the vessel provides documentation that repair of such equipment is technically infeasible without cleaning and gas freeing or dry-docking the vessel, the equipment responsible for the leak will be excluded from future Method 21 tests until repairs are effected. A copy of this documentation shall be maintained by the owner or operator of the affected source. Repair of the equipment responsible for the leak shall occur the next time the vessel is cleaned and gas freed or dry-docked. For repairs that are technically feasible without dry-docking the vessel, the owner or operator of the affected source shall not load the vessel again unless the marine tank vessel owner or operator can document that the equipment responsible for the leak has been repaired. 40 CFR 63.563(a)(4)(iv)

4) Negative pressure loading. The owner or operator of an affected source shall ensure that a marine tank vessel is loaded with the product tank below atmospheric pressure (i.e., at negative gauge pressure). The pressure shall be measured between the facility's vapor connection and its manual isolation valve, and the measured pressure must be below atmospheric pressure. Following the date on which the initial performance test is completed, marine tank vessel loading operations for nonvapor-tight vessels must be performed below atmospheric pressure (i.e., at negative gauge pressure) in the product tank. 40 CFR 63.563(b)

b. Compliance determination for affected sources. The following procedures shall be used to determine compliance with the emissions limits under §63.562(b), (c), and (d). 40 CFR 63.563(b)(1)

i. Initial performance test. An initial performance test shall be conducted using the procedures listed in §63.7 of subpart A of this part according to the applicability in Table 1 of §63.560, the procedures listed in this section, and the test methods listed in §63.565. The initial performance test shall be conducted within 180 days after the compliance date for the specific affected source. During this performance test, sources subject to MACT standards under §63.562(b)(2), (3), (4), and (5) and (d)(2) shall determine the reduction of HAP emissions, as VOC, for all combustion or recovery devices other than flares. Sources subject to RACT standards under §63.562(c)(3), (4), and (5) and (d)(2) shall determine the reduction of VOC emissions for all combustion or recovery devices other than flares. 40 CFR 63.563(b)(2)

ii. Performance test exemptions. An initial performance test required in this section and in §63.565(d) and the continuous monitoring in §63.564(e) is not required in the following cases: 40 CFR 63.563(b)(2)(i)

1) When a boiler or process heater with a design heat input capacity of 44 Megawatts or less is used to comply with §63.562(b)(2), (3), or (4), (c)(3) or (4), or (d)(2) and the vent stream is used as the primary fuel or with the primary fuel; 40 CFR 63.563(b)(2)(ii)

2) When a boiler or process heater with a design heat input capacity of 44 Megawatts or greater is used to comply with §63.562(b)(2), (3), or (4), (c)(3) or (4), or or (d)(2); or 40 CFR 63.563(b)(2)(iii)

3) When a boiler subject to 40 CFR part 266, subpart H, "Hazardous Waste Burned in Industrial Furnaces," that has demonstrated 99.99 percent destruction or recovery efficiency is used to comply with §63.562(b)(2), (3), or (4), (c)(3) or (4), or or (d)(2). 40 CFR 63.563(b)(3)

iii. Operation and maintenance inspections. If the 3-hour or 3-cycle block average operating parameters in paragraphs (b)(4) through (9) of this section, outside the acceptable operating ranges, are measured and recorded, i.e., variances of the pollution control device or monitoring equipment, the owner or operator of the affected source shall perform an unscheduled inspection of the control device and monitoring equipment and review of the parameter monitoring data. The owner or operator of the affected source shall perform an inspection and review when total parameter variance time for the control device is greater than 10 percent of the operating time for marine tank vessel loading operations on a 30-day, rolling-average basis. The inspection and review shall be conducted within 24 hours after passing the allowable variance time of 10 percent. The inspection checklist from the requirements of §63.562(e)(2)(iii) and the monitoring data from requirements in §§63.562(e)(2)(ii) and 63.564 should be used to identify any maintenance problems that may be associated with the variance. The unscheduled inspection should encompass all components of the control device and monitoring equipment that can be inspected while in operation. If any maintenance problem is identified during the inspection, the owner or operator of the affected source must take corrective action (e.g., adjustments to operating controls, etc.) as soon as practicable. If no immediate maintenance problems are identified from the inspection performed while the equipment is operating, a complete inspection in accordance with §63.562(e)(2) must be conducted prior to the next marine tank vessel loading operation and corrective action (e.g., replacement of defective parts) must be taken as soon as practicable for any maintenance problem identified during the complete inspection. 40 CFR 63.563(b)(4)

iv. Combustion device, except flare. During the initial performance test required in paragraph (b)(1) of this section, the owner or operator shall determine the efficiency of and/or the outlet VOC concentration from the combustion device used to comply with §63.562(b)(2), (3), and (4), (c)(3) and (4), and (d)(2) using the test methods in §63.565(d). The owner or operator shall comply with paragraph (b)(4)(i) or (ii) of this section. 40 CFR 63.563(b)(4)(i)

1) Outlet VOC concentration limit for required percent combustion efficiency. The owner or operator shall establish as an operating parameter the baseline VOC concentration using the procedures described in §63.565(g). Following the date on which the initial performance test is completed, the facility shall be operated with a block average outlet VOC concentration as determined in §63.564(e)(1) no more than 20 percent above the baseline VOC concentration. 40 CFR 63.563(b)(4)(ii)

2) Baseline temperature for required percent combustion efficiency. The owner or operator shall establish as an operating parameter the baseline temperature using the procedures described in §63.565(f).

Following the date on which the initial performance test is completed, the facility shall be operated with the block average temperature as determined in §63.564(e)(2) or (3) no more than 28°C (50°F) below the baseline temperature. 40 CFR 63.563(b)(5)

v. Emission estimation. The owner or operator of a source subject to §63.562(b)(2), (3), and (4) shall use the emission estimation procedures in §63.565(l) to calculate HAP emissions. 40 CFR 63.563(c)

c. Leak detection and repair for vapor collection systems and control devices. The following procedures are required for all sources subject to §63.562(b), (c), or (d). 40 CFR 63.563(c)(1)

i. Annual leak detection and repair for vapor collection systems and control devices. The owner or operator of an affected source shall inspect and monitor all ductwork and piping and connections to vapor collection systems and control devices once each calendar year using Method 21. 40 CFR 63.563(c)(2)

ii. Ongoing leak detection and repair for vapor collection systems and control devices. If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method, all ductwork and piping and connections to vapor collection systems and control devices shall be inspected to the extent necessary to positively identify the potential leak and any potential leaks shall be monitored within 5 days by Method 21. Each detection of a leak shall be recorded, and the leak shall be tagged until repaired. 40 CFR 63.563(c)(3)

iii. When a leak is detected, a first effort to repair the vapor collection system and control device shall be made within 15 days or prior to the next marine tank vessel loading operation, whichever is later.

3. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. **VOC** (40 CFR Part 63 Subpart Y)

i. The owner or operator shall perform the following monitoring requirements in accordance with 40 CFR Part 63 Subpart Y:

1) a) The owner or operator of an affected source shall comply with the monitoring requirements in §63.8 of subpart A of this part in accordance with the provisions for applicability of subpart A to this subpart in Table 1 of §63.560 and the monitoring requirements in this section. 40 CFR 63.564(a)(2)

b) Each owner or operator of an affected source shall monitor the parameters specified in this section. All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the source are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. 40 CFR 63.564(a)(3)

c) Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, all continuous parametric monitoring systems (CPMS) and CEMS shall be in continuous operation while marine tank vessel loading operations are occuring and shall meet minimum frequency of operation requirements. Sources monitoring by use of CEMS and CPMS shall complete a minimum of one cycle of operation (sampling, analyzing, and/or data recording) for each successive 15-minute period. 40 CFR 63.564(a)(4)

d) The owner or operator of a CMS installed in accordance with these emissions standards shall comply with the performance specifications either in performance specification (PS) 8 in 40 CFR part 60, appendix B for CEMS or in §63.7(c)(6) of subpart A of this part for CPMS. 40 CFR 63.564(a)(5)

e) A CEMS is out of control when the measured values (i.e., daily calibrations, multipoint calibrations, and performance audits) exceed the limits specified in either PS 8 or in §63.8(c)(7) of subpart A of this part. The owner or operator of a CEMS that is out of control shall submit all information concerning out of control periods, including start and end dates and hours and descriptions of corrective actions taken, in the excess emissions and continuous monitoring system performance report required in §63.567(e). 40 CFR 63.564(b)

2) Vapor collection system of terminal. Owners or operators of a source complying with §63.563(a)(1) that uses a vapor collection system that contains valves that could divert a vent stream from a control device used to comply with the provisions of this subpart shall comply with paragraph (b)(1), (2), or (3) of this section. 40 CFR 63.564(b)(1)

a) Measure and record the vent stream flowrate of each by-pass line once every 15 minutes. The owner or operator shall install, calibrate, maintain, and operate a flow indicator and data recorder. The flow indicator shall be installed immediately downstream of any valve (i.e., entrance to by-pass line) that could divert the vent stream from the control device to the atmosphere. 40 CFR 63.564(b)(2)

b) Measure the vent stream flowrate of each by-pass line once every 15 minutes. The owner or operator shall install, calibrate, maintain, and operate a flow indicator with either an audio or visual alarm. The flow indicator and alarm shall be installed immediately downstream of any valve (i.e., entrance to by-pass line) that could divert the vent stream from the control device to the atmosphere. The alarm shall be checked every 6 months to demonstrate that it is functioning properly. 40 CFR 63.564(b)(3)

c) Visually inspect the seal or closure mechanism once during each marine tank vessel loading operation and at least once every month to ensure that the valve is maintained in the closed position and that the vent stream is not diverted through the by-pass line; record all times when the car seals have been broken and the valve position has been changed. Each by-pass line valve shall be secured in the closed position with a car-seal or a lock-and-key type configuration. 40 CFR 63.564(c)

3) Pressure/vacuum settings for the marine tank vessel's vapor collection equipment. Owners or operators of a source complying with §63.563(a)(3) shall measure continuously the operating pressure of the marine tank vessel during loading. 40 CFR 63.564(d)

4) Loading at negative pressure. Owners or operators of a source complying with §63.563(a)(4)(iv) that load vessels at less than atmospheric pressure (i.e., negative gauge pressure) shall measure and record the loading pressure. The owner or operator shall install, calibrate, maintain, and operate a recording pressure measurement device (magnehelic gauge or equivalent device) and an audible and visible alarm system that is activated when the pressure vacuum specified in §63.563(a)(4)(iv) is not attained. The owner or operator shall place the alarm system so that it can be seen and heard where cargo transfer is controlled. The owner or operator shall verify the accuracy of the pressure device once each calendar year with a reference pressure monitor (traceable to National Institute of Standards and Technology (NIST) standards or an

independent pressure measurement device dedicated for this purpose). 40 CFR 63.564(e)

5) Combustion device, except flare. For sources complying with §63.563(b)(4), use of a combustion device except a flare, the owner or operator shall comply with paragraph (e)(1), (2), or (3) of this section. Owners or operators complying with paragraphs (e)(2) or (3) shall also comply with paragraph (e)(4) of this section. 40 CFR 63.564(e)(1)

a) Outlet VOC concentration. Monitor the VOC concentrations at the exhaust point of the combustion device and record the output from the system. For sources monitoring the outlet VOC concentration established during the performance test, a data acquisition system shall record a concentration every 15 minutes and shall compute and record an average concentration each cycle (same time period or cycle as the performance test) and a 3-cycle block average concentration every third cycle. For sources monitoring the 1,000 ppmv VOC concentration for gasoline loading, a data acquisition system shall record a concentration every 15 minutes and shall compute and record an average concentration each hour and a 3-hour block average concentration every third hour. The owner or operator will install, calibrate, operate, and maintain a CEMS consistent with the requirements of PS 8 to measure the VOC concentration. The daily calibration requirements are required only on days when marine tank vessel loading operations occur. 40 CFR 63.564(e)(2)

b) Operating temperature determined during performance testing. If the baseline temperature was established during the performance test, the data acquisition system shall record the temperature every 15 minutes and shall compute and record an average temperature each cycle (same time period or cycle of the performance test) and a 3-cycle block average every third cycle. 40 CFR 63.564(e)(3)

c) Manufacturer's recommended operating temperature. If the baseline temperature is based on the manufacturer recommended operating temperature, the data acquisition system shall record the temperature every 15 minutes and shall compute and record an average temperature each hour and a 3-hour block average every third hour. 40 CFR 63.564(e)(4)

d) Temperature monitor. The owner or operator shall install, calibrate, operate, and maintain a temperature monitor accurate to within ±5.6°C (±10°F) or within 1 percent of the baseline temperature, whichever is less stringent, to measure the temperature. The monitor shall be installed at the exhaust point of the combustion device but not within the combustion zone. The owner or operator shall verify the accuracy of the temperature monitor once each calendar year with a reference temperature monitor (traceable to National Institute of Standards and Technology (NIST) standards or an independent temperature measurement device dedicated for this purpose). During accuracy checking, the probe of the reference device shall be at the same location as that of the temperature monitor being tested. 40 CFR 63.564(f)

ii. The owner or operator shall conduct the initial performance test on the Vapor Combustion System no later than May 25 2000, unless directed by the District to test more frequently. The test shall be conducted in accordance with 40 CFR Part 63 Subpart Y as follows:

Performance testing. The owner or operator of an affected source in §63.562 shall comply with the performance testing requirements in §63.7 of subpart A of this part in accordance with the provisions for applicability of subpart A to this subpart in Table 1 of §63.560 and the performance testing requirements in this section. 40 CFR 63.565(b)

b. **TAP**

See Additional Condition 4.b.

4. **Record keeping** (Regulation 2.16, section 4.1.9.2)

a. **VOC** (Regulation 1.05, section 4.1 and 40 CFR Part 63 Subpart Y)

i. The owner or operator shall keep records, on a daily basis, of throughput for the barge loading. (Regulation 1.05, section 4.1)

ii. The owner or operator shall keep the following records as required by 40 CFR Part 63 Subpart Y.

1) If a vent system, or vapor collection system, containing valves that could divert the emission stream away from the control device is used, each owner or operator of an affected source shall keep for at least 5 years up-to-date, readily accessible continuous records of: 40 CFR 63.567(g)(1)

a) All periods when flow bypassing the control device is indicated if flow indicators are installed under §63.563(a)(1) and §63.564(b), and 40 CFR 63.567(g)(2)

b) All times when maintenance is performed on car-sealed valves, when the car-seal is broken, and when the valve position is changed (i.e., from open to closed for valves in the vent piping to the control device and from closed to open for valves that vent the stream directly or indirectly to the atmosphere bypassing the control device) if valves are monitored under §63.564(b). 40 CFR 63.567(h)

2) The owner or operator of an affected source shall keep the vapor-tightness documentation required under §63.563(a)(4) on file at the source in a permanent form available for inspection. 40 CFR 63.567(i)

3) Vapor tightness test documentation for marine tank vessels. The owner or operator of an affected source shall maintain a documentation file for each marine tank vessel loaded at that source to reflect current test results as determined by the appropriate method in §63.565(c)(1) and (2). Updates to this documentation file shall be made at least once per year. The owner or operator shall include, as a minimum, the following information in this documentation: 40 CFR 63.567(i)(1)

a) Test title; 40 CFR 63.567(i)(2)
b) Marine vessel owner and address; 40 CFR 63.567(i)(3)
c) Marine vessel identification number; 40 CFR 63.567(i)(4)
d) Loading time, according to §63.563(a)(4)(ii) or (iii), if appropriate; 40 CFR 63.567(i)(5)
e) Testing location; 40 CFR 63.567(i)(6)
f) Date of test; 40 CFR 63.567(i)(7)
g) Tester name and signature; 40 CFR 63.567(i)(8)
h) Test results from §63.565(c)(1) or (2), as appropriate; 40 CFR 63.567(i)(9)
i) Documentation provided under §63.563(a)(4)(ii) and (iii)(B) showing that the repair of leaking components attributed to a failure of a vapor-tightness test is technically infeasible without dry-docking the vessel; and 40 CFR 63.567(i)(10)
j) Documentation that a marine tank vessel failing a pressure test or leak test has been repaired. 40 CFR 63.567(j)

4) Emission estimation reporting and recordkeeping procedures. The owner or operator of each source complying with the emission

limits specified in §63.562(b)(2), (3), and (4) shall comply with the following provisions: 40 CFR 63.567(j)(1)

a) Maintain records of all measurements, calculations, and other documentation used to identify commodities exempted under §63.560(d); 40 CFR 63.567(j)(2)

b) Keep readily accessible records of the emission estimation calculations performed in §63.565(l) for 5 years; and 40 CFR 63.567(j)(3)

c) Submit an annual report of the source's HAP control efficiency calculated using the procedures specified in §63.565(l), based on the source's actual throughput. 40 CFR 63.567(j)(4)

d) Owners or operators of marine tank vessel loading operations specified in §63.560(a)(3) shall retain records of the emissions estimates determined in §65.565(l) and records of their actual throughputs by commodity, for 5 years. 40 CFR 63.567(k)

5) Leak detection and repair of vapor collection systems and control devices. When each leak of the vapor collection system, or vapor collection system, and control device is detected and repaired as specified in §63.563(c) the following information required shall be maintained for 5 years: 40 CFR 63.567(k)(1)

a) Date of inspection; 40 CFR 63.567(k)(2)
b) Findings (location, nature, and severity of each leak); 40 CFR 63.567(k)(3)
c) Leak determination method; 40 CFR 63.567(k)(4)
d) Corrective action (date each leak repaired, reasons for repair interval); and 40 CFR 63.567(k)(5)
e) Inspector name and signature.

b. **TAP**

The owner or operator shall evaluate and document process changes to demonstrate that the emission levels established during compliance demonstration are not exceeded; and make these record available to the District upon request. If there is an increase in emission levels, the owner or operator shall demonstrate that emissions do not exceed the adjusted significant level (ASL), based on potential to emit (PTE).

5. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. **VOC** (Regulation 2.16, section 4.1.9.3 and 40 CFR Part 63 Subpart Y)

i. The owner or operator shall clearly identify all deviations from permit requirements in the semi-annual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report semi-annually the following:

1) For emission points subject to 40 CFR Part 63 Subpart Y:

a) Emission unit ID number and emission point ID number
b) The beginning and ending date of the reporting period
c) Identifiy the number of times control device was bypassed and the dates of the occurance
d) Description of any corrective action taken for each bypass
e) Identify the number of marine vessels that fail the vapor tightness requirements

2) For emission points subject to Regulation 2.04:

a) Emission unit ID number and emission point ID number
b) The beginning and ending date of the reporting period
c) Identifiy all periods of exceedance of the throughput limit
d) Description of any corrective action taken for each exceedance

ii. The owner or operator shall submit the following additional reporting requirements as required by 40 CFR Part 63 Subpart Y:

1) The owner or operator of an affected source shall fulfill all reporting and recordkeeping requirements in §§63.9 and 63.10 of subpart A of this part in accordance with the provisions for applicability of subpart A to this subpart in Table 1 of §63.560 and fulfill all reporting and recordkeeping requirements in this section. These reports will be made to the Administrator at the appropriate address identified in §63.13 of subpart A of this part. 40 CFR 63.567(a)(1)

2) Notification requirements. The owner or operator of an affected source shall fulfill all notification requirements in §63.9 of subpart A of this part in accordance with the provisions for applicability of that section to this subpart in Table 1 of §63.560 and the notification requirements in this paragraph. 40 CFR 63.567(b)(1)

3) Summary reports and excess emissions and monitoring system performance reports. 40 CFR 63.567(e)(1)

a) Schedule for summary report and excess emissions and monitoring system performance reports. Excess emissions and parameter monitoring exceedances are defined in §63.563(b). The owner or operator of a source subject to these emissions standards that is required to install a CMS shall submit an excess emissions and continuous monitoring system performance report and/or a summary report to the Administrator once each year, except, when the source experiences excess emissions, the source shall comply with a semi-annual reporting format until a request to reduce reporting frequency under paragraph (e)(2) of this section is approved. 40 CFR 63.567(e)(2)

b) Request to reduce frequency of excess emissions and continuous monitoring system performance reports. An owner or operator who is required to submit excess emissions and continuous monitoring system performance and summary reports on a semi-annual basis may reduce the frequency of reporting to annual if the following conditions are met: 40 CFR 63.567(e)(2)(i)

(i) For 1 full year the sources's excess emissions and continuous monitoring system performance reports continually demonstrate that the source is in compliance; and 40 CFR 63.567(e)(2)(ii)

(ii) The owner or operator continues to comply with all recordkeeping and monitoring requirements specified in this subpart and subpart A of this part. 40 CFR 63.567(e)(3)

c) The frequency of reporting of excess emissions and continuous monitoring system performance and summary reports required may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change and the Administrator does not object to the intended change. In deciding whether to approve a reduced frequency of reporting, the Administrator may review information concerning the source's entire previous performance history during the 5-year recordkeeping prior to the intended change, including performance test results, monitoring data, and evaluations of an owner or operator's conformance with operation maintenance requirements. Such information may be used by the Administrator to make a judgement about the source's potential for noncompliance in the future. If the Administrator will notify the owner or operator in writing

within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted. 40 CFR 63.567(e)(4)

d) Content and submittal dates for excess emissions and monitoring system performance reports. All excess emissions and monitoring system performance reports and all summary reports, if required per paragraph (e)(5) and (6) of this section, shall be delivered or postmarked within 30 days following the end of each calendar year, or within 30 days following the end of each six month period, if appropriate. Written reports of excess emissions or exceedances of process or control system parameters shall include all information required in §63.10(c)(5) through (13) of subpart A of this part as applicable in Table 1 of §63.560 and information from any calibration tests in which the monitoring equipment is not in compliance with PS 8 or other methods used for accuracy testing of temperature, pressure, or flow monitoring devices. The written report shall also include the name, title, and signature of the responsible official who is certifying the accuracy of the report. When no excess emissions or exceedances have occurred or monitoring equipment has not been inoperative, repaired, or adjusted, such information shall be stated in the report. This information will be kept for a minimum of 5 years and made readily available to the Administrator or delegated State authority upon request. 40 CFR 63.567(e)(5)

e) If the total duration of excess emissions or control system parameter exceedances for the reporting period is less than 5 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 10 percent of the total operating time for the reporting period, only the summary report of §63.10(e)(3)(vi) of subpart A of this part shall be submitted, and the full excess emissions and continuous monitoring system performance report of paragraph (e)(4) of this section need not be submitted unless required by the Administrator. 40 CFR 63.567(e)(6)

f) If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is 5 percent or greater of the total operating time for

the reporting period, or the total CMS downtime for the reporting period is 10 percent or greater of the total operating time for the reporting period, both the summary report of §63.10(e)(3)(vi) of subpart A of this part and the excess emissions and continuous monitoring system performance report of paragraph (e)(4) of this section shall be submitted. 40 CFR 63.567(f)

4) Vapor collection system of the terminal. Each owner or operator of an affected source shall submit with the initial performance test and maintain in an accessible location on site an engineering report describing in detail the vent system, or vapor collection system, used to vent each vent stream to a control device. This report shall include all valves and vent pipes that could vent the stream to the atmosphere, thereby bypassing the control device, and identify which valves are car-sealed opened and which valves are car-sealed closed. 40 CFR 63.567(g)

b. **TAP**

There are no compliance reporting requirements for these pollutants.

Plantwide Additional Conditions

1. **Standards** (Regulation 2.16, section 4.1.1)

VOC (40 CFR Part 63 Subpart R *National Emission Standards for Gasoline Distribution Facilities*)

The owner or operator shall comply with the following standards for volatile organic compounds as required by 40 CFR Part 63 Subpart R:

a. The affected source to which the provisions of this subpart apply is each bulk gasoline terminal, except those bulk gasoline terminals: 40 CFR 63.420(a)(1)

For which the owner or operator has documented and recorded to the Administrator's satisfaction that the result, ET, of the following equation is less than 1, and complies with requirements in paragraphs (c), (d), (e), and (f) of this section: (See comment below)

ET = CF [0.59 (TF) (1-CE) + 0.17 (TE) + 0.08 (TES) + 0.038 (TI) + 8.5 × 10-6 (C) + KQ] + 0.04(OE)
where:

CF = 0.161 for bulk gasoline terminals and pipeline breakout stations that do not handle any reformulated or oxygenated gasoline containing 7.6 percent bt volume or greater methyl tert-butyl ether (MTBE), OR
CF = 1.0 for bulk gasoline terminals and pipeline breakout stations that handle reformulated or oxygenated gasoline containing 7.6 percent by volume or greater MTBE;
CE = control efficiency limitation on potential to emit for the vapor processing system used to control emissions from fixed-roof gasoline storage vessels [value should be added in decimal from (percent divided by 100)];
TF = total number of fixed-roof gasoline storage vessels without an internal floating roof;
TE = total number of external floating roof gasoline storage vessels with only primary seals;
TES = total number of external floating roof gasoline storage vessels with primary and secondary seals;
TI = total number of fixed-roof gasoline storage vessels with an inernal floating roof;
C = number of valves, pumps, connectors, loading arm valves, and open-ended lines in gasoline service;
Q = gasoline throughput limitation on potential to emit or gasoline throughput limit in compliance with paragrahs (c), (d), and (f) of this section (liters/day);
K = 4.52 × 10-6 for bulk gasoline terminals with uncontrolled loading racks (no vapor collection and processing systems), OR

K = (4.5 × 10-9(EF + L) for bulk gasoline terminals withcontrolled loading racks (loading racks that have vapor collection and processing sytems in stalled on the emission stream);
EF = emission rate limitation on potential to emit for the gasoline cargo tank loading rack vapor processor outlet emissions (mg of total organic compounds per liter of gasoline loaded);
OE = other HAP emissions screening factor for bulk gasoline terminals or pipeline breakout stations (tons per year). OE equals the total HAP from other emission sources not specified in parameters in the equations for ET or EP. If the value of 0.04 (OE) is greater than 5 percent of either ET or EP, then paragraphs (a)(1) and (b)(1) of this section shall not be used to determine applicability;
L = 13 mg/l for gasoline cargo tanks meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in§60.501 of this chapter, OR
L = 304 mg/l for gasoline cargo tanks not meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in §60.501 of this chapter; or [§63.420(a)(1) amended at 62 FR 9092, Feb. 28, 1997]

b. A facility for which the results, ET or EP, of the calculation in paragraph (a)(1) or (b)(1) of this section has been documented and is less than 1.0 but greater than or equal to 0.50, is exempt from the requirements of this subpart, except that the owner or operator shall: 40 CFR 63.420(c)(1)

i. Operate the facility such that none of the facility parameters used to calculate results under paragraph (a)(1) or (b)(1) of this section, and approved by the District, is exceeded in any rolling 30-day period; and 40 CFR 63.420(c)(2)

ii. Maintain records and provide reports in accordance with the provisions of §63.428(i). 40 CFR 63.420(d)

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

VOC (40 CFR Part 63 Subpart R)

See Additional Condition 3

3. **Record keeping** (Regulation 2.16, section 4.1.9.2)

VOC (40 CFR Part 63 Subpart R)

The owner or operator shall maintain records to document that the facility parameters established under §63.420(c) have not been exceeded (40 CFR 63.428(i)(3)). The records must be kept for five years as required by Regulation 2.16, section 4.1.9.2.2

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

VOC (40 CFR Part 63 Subpart R)

The owner or operator of a facility meeting the criteria in §63.420(c) shall perform the requirements of this paragraph (i), all of which will be available for public inspection: 40 CFR 63.428(i)(1)

a. Document and report to the District not later than December 16, 1996 for existing facilities, within 30 days for existing facilities subject to §63.420(c) after December 16, 1996, or at startup for new facilities the methods, procedures, and assumptions supporting the calculations for determining criteria in §63.420(c); [§63.428(i)(1) amended at 61 FR 7723, Feb. 29, 1996] 40 CFR 63.428(i)(2) (See comments below)

b. Report annually, within 60 days of the end of the calendar year, to the District that the facility parameters established under §63.420(c) have not been exceeded. 40 CFR 63.428(i)(4)

c. At any time following the notification required under paragraph (i)(1) of this section and approval by the District of the facility parameters, and prior to any of the parameters being exceeded, the owner or operator may submit a report to request modification of any facility parameter to the District for approval. Each such request shall document any expected HAP emission change resulting from the change in parameter.

Comment

The company submitted the required documentation in the correspondence dated February 23, 1999, to demonstrate that 40 CFR Part 63 Subpart R does not apply to this source.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-Permit Documents

There are no Off-Permit Documents associated with the issuance of this permit.

Alternative Operating Scenario

The owner or operator did not request to operate under any alternative operating scenario in its Title V application

Source-Wide HAP Speciation			
HAP	**CAS#**	**HAP**	**CAS#**
Methyl-tert-butyl-ether	1634-04-4	Xylene	1330-20-7
Benzene	71-43-2	Hexane	110-54-3
Toluene	108-88-3	Trimethylpentane (2,2,4)	540-84-1
Ethlybenzene	100-41-4		

Insignificant Activities		
Description	**Basis**	**Quantity**
Gravel driveways	No regulation	various
Oil/water separators <200gal/day	Regulation 6.26, section 1	various
Truck compartmental flushing	No regulation	various
Barge hose drainage/drippage	No regulation	various
Sewer drains	No regulation	various
Non-halogenated solvent parts cleaners*	Regulation 2.02, section 2.3.22	various
Laboratory solvents & hoods	Regulation 2.02, section 2.3.11	various
Asphalt recycling	No regulation	various
Butane blending	No regulation	various
Pipeline relief sumps	Regulation 2.02, section 2.3.10	various

Insignificant Activities		
Description	**Basis**	**Quantity**
Distillate barge loading (vapor press. <1.5 psia)	40 CFR Part 63, section 63.560 (d) 1	1
Distillate load rack < 1.5 psia	Regulation 6.22, section 2.4	1
Airport UPS pipeline	No regulation	1
Used oil loadrack < 1.5 psia	Regulation 6.22, section 2.4	1
Diesel Fuel Storage Tanks, E4 (Tank 97) and E5 (Tank 98), vapor pressure less than 10 mmHg at 20°C and 760 mm of Hg	Regulation 2.02, section 2.3.9.2	2

1. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

2. Activities identified in Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.

    *a. Non-halogenated cold solvent parts cleaners shall be operated in compliance with all applicable sections of Regulations 6.18 and 7.18, including Section 4 of each.

    b. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.

    c. No periodic monitoring shall be required for facilities designated as insignificant activities.

Comment

For emission points E4 (Tank 97) and E5 (Tank 98) the Federal regulations do not apply due to the equipment installation date.

Attachment 1

1.05 COMPLIANCE PLAN
(April 2000)

MARATHON ASHLAND PETROLEUM LLC

4510 ALGONQUIN PARKWAY
LOUISVILLE, KENTUCKY 40211
(502) 772-5200

Marathon Ashland Petroleum LLC currently utilizes the AP-42 Compilation of Air Pollution Emission Factors" document for calculating VOC emissions from its sources.

Throughput records are maintained monthly/annually for the tanks and daily/annually for the loading rack. From these throughput records, VOC emission estimates can be determined by the emission factors set forth in AP-42.

All storage tanks and loading racks are equipped with the required equipment specified in the Jefferson County, State of Kentucky, and Federal air regulations. All storage tanks are equipped with submerged fill pipes. All non-New Source Performance Standard storage tanks containing products with true vapor pressures greater than 1.5 psia have been fitted with internal floating roofs. All New Source Performance Standard (NSPS) storage tanks containing products with true vapor pressures greater than 0.75 psia have been equipped with internal floating roofs. There are no external floating roof storage tanks at this site.

All exposed seals are visually inspected annually. When the tanks are taken out of service, all seals are physically inspected and replaced if necessary .For tanks meeting NSPS requirements, all seals are visually inspected every five years.

The bottom-filling loading rack is equipped with a John Zink Vapor Recovery unit, which meets the maximum regulatory rate of 80 mg/L of gasoline loaded. A performance test was conducted on this unit on June 11 I 1999, with a test result of 1.10 mg/L, which is well below the regulatory standard. The efficiency of this unit is estimated to be 98-99%. Marathon A&1land Petroleum LLC currently employs mechanical technicians who are responsible for the maintenance of this unit. The mechanical technician will perform semi-annual and annual maintenance checks on the unit. These checks include, but are not limited to, a thorough check of the unit's valves, flanges, pumps, seals, gauges, fluid levels, piping and associated loading rack components. In addition, the terminal personnel are responsible for the daily and weekly inspection, which includes recording various gauge data.

A copy of the daily checklist detailing the unit's key operation indicators is attached to this plan. This checklist shall be completed when the terminal is staffed. The daily checklist ensures that the vapor recovery unit is operating as designed and tested. To ensure proper regeneration of the carbon beds, the maximum vacuum pulled during the regeneration cycle shall be greater than or equal to 26.5 inches of Hg. To ensure proper absorption by the absorption tower, the gasoline supply temperature shall not exceed 98 degrees F. Additional setpoints are indicated on the daily checklist form. These operational setpoints and ranges are those recommended and set by the manufacturer, service company, or Marathon Ashland Mechanical Technician. If the unit is out of range, these deviations and required corrections shall be noted on the form.

The barge loading facility is equipped with a John link combustor unit, which is designed to meet a limit of 18 mg/L. The initial test of the combustor is scheduled for May 4, 2000. The efficiency of this unit is estimated to be 98-99%. Marathon Ashland Petroleum LLC currently employs mechanical technicians who are responsible for the maintenance of this unit. The mechanical technician will perform semi-annual and annual maintenance checks on the unit. These checks include, but are not limited to, a thorough check of the unit's.yalves, flanges, pumps, seals, gauges, fluid levels, piping and associated loading / combustor components. In addition, the terminal personnel are responsible for the daily-while-operating checks.

The barge loading facility has a twelve-month total throughput limit of 504,000,000 gallons of gasoline. To ensure compliance with the throughput limit, the daily throughput totals will be monitored and a rolling twelve-month total will be maintained.

MARATHON ASHLAND PETROLEUM LLC
LOUISVILLE ALGONQUIN TERMINAL
VAPOR RECOVERY UNIT DALLY CHECKLIST

DATE: _____ TIME: _____

1. GASOLINE SIGHT LEVEL _____

2. GASOLINE SUPPLY PRESSURE _____

3. INLET GASOLINE TEMP. _____

4. GASOLINE RETURN PRESSURE _____

5. GLYCOL SIGHT LEVEL _____

6. TOP ABSORBER NOZZLE PRESSURE (8.0 PSI) _____

7. SEAL FLUID TEMP. TO C-I V AC. PUMP _____

8. SEAL FLUID TEMP .TO C-2 V AC. PUMP _____

9. SEAL FLUID FLOW RATE TO C-I VAC. PUMP _____

10. C-I V AC. PUMP PRESSURE _____

11. SEAL FLUID TEMP. FROM C-I V AC. PUMP _____

12. SEAL FLUID TEMP. FROM C-2 V AC. PUMP _____

13. SEAL FLUID FLOW RATE TO C-2 V AC. PUMP _____

14. C-2 V AC. PUMP PRESSURE _____

15. TEMP. DIFFERENCE THRU C-I V AC. PUMP (APPROX. 10 DEGREES) _____

16. TEMP. DIFFERENCE THRU C-2 V AC. PUMP (APPROX. 10 DEGREES) _____

17. SEAL FLUID PUMP PRESSURE _____

18. BOTTOM ABSORBER NOZZLE PRESSURE _____

19. GASOLINE TEMP. OUT OF HEAT EXCHANGER _____

20. MAXIMUM VACUUM READING ON BED #1 _____ BED #2 _____

21. BED #1 TEMP. TOP _____ MIDDLE _____ BOTTOM _____

22. BED #2 TEMP. TOP _____ MIDDLE _____ BOTTOM _____

23. ANY LEAKS ON VAPOR UNIT (Y/N) _____

24. ANY CARBON DUST FROM UNIT (Y/N) _____

25. CHECK GLYCOL CONCENTRATION **WEEKLY** (Y/N) _____

26. CHECK OIL LEVEL ON SUPPLY& RETURN PUMPS (Y/N) _____

27. MAGNAHELIC READING 27A _____ 27B _____ DIFFERENCE A & B _____